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January 27, 2016

VIA ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2102
New York, NY 10007-1312

Re: SEC v. Tuzman, et al., No. 15 Civ. 7057 (AJN) (S.D.N.Y.)

Dear Judge Nathan:

We represent Kaleil Isaza Tuzman in the above-referenced matter. Pursuant to Rule 3(E) of Your Honor's Individual Practices in Civil Cases, we write to respectfully request oral argument on the Government's Application to Intervene and for a Limited Stay of Discovery.

We thank the Court for its consideration.

Respectfully submitted,



Avi Weitzman

AW

cc: Richard G. Primoff, SEC (*via E-Mail*)
Alexander Janghorbani, SEC (*via E-Mail*)
Kristine M. Zaleskas, SEC (*via E-Mail*)
Damian Williams, U.S. Attorney's Office (*via E-Mail*)
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